The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) evaluate a project's effect in relationship to broader changes occurring, or that are foreseeable to occur, in the surrounding environment. Accordingly, this chapter presents a discussion of CEQA-mandated analysis for cumulative impacts, significant irreversible effects, and significant and unavoidable impacts associated with the proposed West Area Neighborhoods Specific Plan.

4.1 CUMULATIVE SETTING AND IMPACT ANALYSIS

Introduction

CEQA requires that an EIR contain an assessment of the cumulative impacts that could be associated with the Specific Plan. According to CEQA Guidelines Section 15130(a), "an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable." "Cumulatively considerable," as defined in section 15065(a)(3), means that "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects" (as defined by Section 15130). As defined in CEQA Guidelines Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. A cumulative impact occurs from:

...the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

In addition, Section 15130(b) identifies that the following three elements are necessary for an adequate cumulative analysis:

1) Either:

- (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or,
- (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or plans for the reduction of greenhouse gas emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

- 2) A summary of the expected environmental effects to be produced by those projects with specific reference to additional information stating where that information is available; and
- 3) A reasonable analysis of the cumulative impacts of the relevant projects. An EIR shall examine reasonable, feasible options for mitigating or avoiding the project's contribution to any significant cumulative effects.

Where a lead agency is examining a project with an incremental effect that is not "cumulatively considerable," a lead agency need not consider that effect significant, but shall briefly describe its basis for concluding that the incremental effect is not cumulatively considerable.

CUMULATIVE SETTING

Under CEQA, the discussion of cumulative impacts should focus on the severity of the impacts and the likelihood of their occurrence. The geographic scope for the cumulative analysis covers the entire Fresno General Plan Planning Area, which includes the City limits and the Sphere of Influence. The analysis of cumulative effects considered the cumulative projected General Plan buildout throughout the City, as described in the Fresno General Plan.

The Fresno General Plan was approved in December 2014 and assumes two levels of development, including the "General Plan Horizon" and "General Plan Buildout". The General Plan Horizon will occur in the year 2035 and assumes that vacant and underutilized land available for development in the City's Sphere of Influence will not be developed by the year 2035. Therefore, the General Plan Buildout is anticipated to occur past the horizon year of 2035 and analyzes the complete development under the General Plan, including the Sphere of Influence.

Table 4.0-1, below, shows the residential development potential under the General Plan Horizon and General Plan Buildout development scenarios, as described within the City of Fresno General Plan. As shown, approximately 191,000 dwelling units currently exist in the General Plan Planning Area. Under the General Plan Horizon scenario, the total residential capacity would be 267,000 dwelling units. Under the General Plan Buildout scenario, the total residential capacity would be 336,000 dwelling units.

TABLE 4.0-1: RESIDENTIAL GROWTH PROJECTIONS UNDER FRESNO GENERAL PLAN¹

RESIDENTIAL DWELLING UNITS	GENERAL PLAN HORIZON	General Plan Buildout
Existing ²	191,000	191,000
Additional Capacity	76,000	145,000
Total Capacity	267,000	336,000

NOTES: 1. CALCULATIONS WERE BASED ON AUGUST 9, 2012 LAND USE DIAGRAM DRAFT FIGURE 2 OF THE INITIATION DRAFT

2. Existing dwelling unit count is based on the 2010 Census for dwelling units within the City limits (approximately 171,000 dwelling units) added to the Fresno Council of Governments informal aerial photo and census tract study estimate of 2010 population of dwelling units within the area located outside of the City Limits and inside the City's SOI boundary (approximately 20,000 dwelling units).

Source: Fresno General Plan Table 1-2, December 2014.

Table 4.0-2, below, presents the anticipated population under the General Plan Horizon and General Plan Buildout development scenarios. As shown, approximately 545,000 people currently reside in the General Plan Planning Area. The General Plan Horizon is anticipated to accommodate a population of 226,000 new residents by 2035, resulting in a total population of 771,000. The General Plan Buildout anticipates an additional 425,000 new residents over the existing population by an unspecified date within the Sphere of Influence, resulting in a total population of 970,000.

TABLE 4.0-2: POPULATION PROJECTIONS UNDER FRESNO GENERAL PLAN¹

POPULATION	GENERAL PLAN HORIZON	GENERAL PLAN BUILDOUT
Existing ²	545,000	545,000
Additional Estimated	226,000	425,000
Total	771,000	970,000

NOTES: 1. CALCULATIONS WERE BASED ON AUGUST 9, 2012 LAND USE DIAGRAM DRAFT FIGURE 2 OF THE INITIATION DRAFT

Source: Fresno General Plan Table 1-5, December 2014.

The amount of new non-residential development identified within the City of Fresno General Plan for the General Plan Horizon and General Plan Buildout are presented below in Table 4.0-3. Under the General Plan Horizon scenario, an estimated 55,019,275 square feet of non-residential uses could result by 2035, while nearly 104,000,000 square feet of non-residential capacity above current levels (approximately 49,000,000 square feet more than the 2035 horizon) is anticipated under General Plan Buildout.

TABLE 4.0-3: NON-RESIDENTIAL DEVELOPMENT UNDER FRESNO GENERAL PLAN¹

ТүрЕ	Additional Floor Area Above Current Levels in Square Feet	
	GENERAL PLAN HORIZON	General Plan Buildout
Retail ²	10,925,293	20,613,762
Office ³	18,334,371	34,593,153
Industrial and Business Parks ⁴	25,759,611	48,603,040
Total	55,019,275	103,809,955

NOTES: 1. CALCULATIONS WERE BASED ON AUGUST 9, 2012 LAND USE DIAGRAM DRAFT FIGURE 2 OF THE INITIATION DRAFT

Source: Fresno General Plan Table 1-6, December 2014.

According to the Fresno General Plan, the City estimates that there would be 0.48 jobs per new resident at the General Plan Horizon Year of 2035. Therefore, at the General Plan Horizon, the Planning Area could accommodate approximately 108,000 new jobs above current levels, consisting of 50,000 new retail jobs, 32,500 new office jobs, and 25,500 new other jobs. With respect to General Plan Buildout after 2035, the Fresno General Plan estimates that there would be 0.45 new jobs per resident. Therefore, at General Plan Buildout, the Planning Area could accommodate approximately 189,500 new jobs above current levels, consisting of 87,700 new retail jobs, 57,000 new office jobs, and 44,700 new other jobs.

^{2.} Existing population includes the entire SOI area population from the 2010 Census Data.

^{2.} Sum of commercial floor area plus 50 percent of non-residential CMX floor area, 80 percent non-residential NMX floor area, 87.5 percent of non-residential RMX floor area, and 10 percent of BP/RBP floor area.

^{3.} Sum of office floor area plus 50 percent of non-residential CMX floor area, 20 percent non-residential NMX floor area, 12.5 percent of non-residential RMX floor area, and 60 percent of BP/RBP floor area.

^{4.} Sum of light and heavy industry land use floor area plus 30 percent of BP/RBP floor area.

CUMULATIVE EFFECTS OF THE PROJECT

Cumulative settings are identified under each cumulative impact analysis. Cumulative settings vary because the area that the impact may affect is different. For example, noise impacts generally only impact the local surrounding area because noise travels a relatively short distance while air quality impacts affect the whole air basin as wind currents control air flow and are not generally affected by natural or manmade barriers which would affect noise.

Method of Analysis

Although the environmental effects of an individual project may not be significant when that project is considered separately, the combined effects of several projects may be significant when considered collectively. State CEQA Guidelines 15130 requires a reasonable analysis of a project's cumulative impacts, which are defined as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts." The cumulative impact that results from several closely related projects is: the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (State CEQA Guidelines 15355[b]). Cumulative impact analysis may be less detailed than the analysis of the project's individual effects (State CEQA Guidelines 15130[b]).

There are two approaches to identifying cumulative projects and the associated impacts. The list approach identifies individual projects known to be occurring or proposed in the surrounding area in order to identify potential cumulative impacts. The projection approach identifies potential cumulative impacts through the use of a summary of projections found in adopted local, regional or statewide plans (e.g., General Plans) or related planning or environmental documents as sometimes supplemented by additional information such as a regional modeling program. This EIR uses the projection approach for the cumulative analysis and considers the development anticipated to occur upon General Plan buildout in the area in addition to the pending and proposed projects in the area.

Project Assumptions

The West Area Neighborhoods Specific Plan's contribution to environmental impacts under cumulative conditions is based on full buildout of the Plan Area. See Chapter 2.0, Project Description, for a complete description of the Specific Plan.

Cumulative Impacts

Some cumulative impacts for issue areas are not quantifiable and are therefore discussed qualitatively as they pertain to development patterns in the surrounding region. Exceptions to this are topics like traffic and utilities, which may be quantified by estimating future traffic patterns, demand for specific utilities, etc. and determining the combined effects that may result. The potential cumulative impacts associated with the Specific Plan are summarized below.

AESTHETICS AND VISUAL RESOURCES

The cumulative setting for aesthetics is the Fresno Planning Area, as defined in the City of Fresno General Plan.

Impact 4.1: Specific Plan implementation will contribute to the cumulative degradation of the existing visual character of the region. (Considerable Contribution and Significant and Unavoidable)

Under cumulative conditions, buildout of the Fresno General Plan would result in changes to the visual character of the Fresno General Plan Planning Area and result in impacts to localized views as new development occurs within the City and the General Plan Planning Area.

As described in Section 3.1, Aesthetics and Visual Resources, no part of Plan Area is designated as a scenic vista by the City of Fresno General Plan, nor does the Plan Area contain any unique or distinguishing features that would qualify it for designation as a scenic vista. Furthermore, there are no designated or eligible State Scenic Highways within or in the vicinity of the Specific Plan Area and no highways in Fresno County are listed as a Designated Scenic Highway by the Caltrans Scenic Highway Mapping System.

Implementation of the proposed Specific Plan would change the visual character of the Specific Plan Area by facilitating the development of urban uses within an area largely comprised of undeveloped sites. Regional growth has and will continue to result in a cumulative aesthetic effect by converting undeveloped land into developed and occupied areas and increasing overall levels of nighttime lighting. Cumulative development entails grading/landform alteration, the development of structures, and the installation of roadways and other infrastructure that has altered and will continue to permanently alter the region's existing visual character. As described in Section 3.1, compliance with the City's General Plan and Municipal Code, and implementation of the proposed Specific Plan's development regulations would reduce visual impacts to the greatest extent feasible; however, the proposed Plan would permanently convert undeveloped rural, agricultural, and open space areas to urbanized uses.

According to the General Plan EIR, buildout of the General Plan would result in the permanent alteration of the visual character of the City of Fresno's General Plan Planning Area from a more rural setting to a setting that is characterized by suburban or urban uses (i.e., streets, residences, and community commercial shopping centers). In addition, buildout of the General Plan would contribute to cumulatively considerable aesthetic impacts. Consequently, even with implementation of the policies and implementation programs identified in the City's General Plan, as well as adopted City regulations to enhance the City's current community character and preserve open space, development of the General Plan area was determined in the General Plan EIR to result in a significant and unavoidable cumulative impact to aesthetics. Although the proposed project would comply with all applicable standards and regulations, impacts related to a substantial adverse effect on a scenic vista, degradation of the existing visual character and quality of the project site and surrounding area, and creation of new sources of light or glare would still occur. Therefore, consistent with the General Plan EIR conclusion, the proposed Specific Plan's incremental

contribution towards cumulative aesthetic impacts would be *cumulatively considerable* and *significant and unavoidable*.

AGRICULTURAL RESOURCES

The cumulative setting for agricultural resources includes the Fresno General Plan Planning area, as defined in the City of Fresno General Plan, in combination with portions of the San Joaquin Valley area, including Fresno County.

Impact 4.2: Specific Plan implementation may contribute to the cumulative impact on agricultural land and uses. (Considerable Contribution and Significant and Unavoidable)

Cumulative development anticipated in the City and County of Fresno, including growth projected by adopted general plans and those being updated, will result in the permanent loss of agricultural land, including important farmlands, significant farmlands, land under Williamson Act contracts, and other farmlands.

As described in Section 3.2, Agricultural Resources, there are no forest lands or land designated or zoned as forest land within the Plan Area or surrounding area; therefore, cumulative development would not contribute to the conversion of some forest lands or timber lands. However, there are approximately 285.65 acres of Farmland of Statewide Importance, 509.39 acres of Unique Farmland, and 1,562.82 acres of Farmland of Local Importance within the proposed Specific Plan Area. Additionally, under the proposed Specific Plan, the approximately 120 acres of Williamson Act Contract land are proposed for Low Density, Medium Low Density, and Medium Density Residential development where agricultural uses are no longer a permitted use. Consequently, adoption of the proposed Specific Plan would result in revisions to the zoning ordinance resulting in a significant impact on existing zoning for agricultural uses because non-agricultural uses, such as low, medium low density, and medium density residential would be allowed on the existing Contract land.

Agricultural land is a limited resource and the cumulative loss of this land is considered significant. Buildout of the proposed Specific Plan would require the future annexation and development of land into the City. If future annexation and development would involve the loss of important farmlands to non-agricultural uses, implementation of Mitigation Measure 3.2-1 would be required. While implementation of Mitigation Measure 3.2-1 would reduce the above-identified impact through preservation of agricultural land at a 1:1 ratio, the impact would not be reduced to a less-than-significant level due to the fact that active agricultural land would still be permanently converted to urban uses. Therefore, impacts on Williamson Act contracts, and important or significant farmlands and forest resources remain *cumulatively considerable* and *significant and unavoidable*.

AIR QUALITY

The cumulative setting for this analysis is the San Joaquin Air Basin (SJVAB). The SJVAB consists of eight counties: Fresno, Kern (western and central), Kings, Tulare, Madera, Merced, San Joaquin, and Stanislaus.

Impact 4.3: Specific Plan implementation would contribute to cumulative impacts on the region's air quality. (Cumulatively Considerable and Significant and Unavoidable)

In accordance with San Joaquin Valley Air Pollution Control District's (SJVAPCD's) methodology, any project that produces a significant project-level regional air quality impact in an area that is in nonattainment contributes to the cumulative impact. Cumulative projects within the local area include new development and general growth within the Plan Area. The greatest source of emissions within the SJVAB is mobile sources. Due to the extent of the area potentially impacted from cumulative project emissions (i.e., the SJVAB); SJVAPCD considers a project cumulatively significant when project-related emissions exceed the SJVAPCD's regional emissions thresholds. No significant cumulative impacts were identified with regard to carbon monoxide (CO) hotspots.

Construction

The SJVAB is designated nonattainment for ozone and fine particulate matter (PM_{2.5}) under the California and National Ambient Air Quality Standards (AAQS) and nonattainment for respirable particulate matter (PM₁₀) under the California AAQS. Construction of cumulative projects will further degrade the regional and local air quality. Air quality will be temporarily impacted during construction activities. As shown in Table 3.3-6 in Section 3.3, construction emissions associated with the proposed Plan would exceed the SJVAPCD's regional construction emissions thresholds for CO, oxides of nitrogen (NOx), reactive organic compounds (ROG), PM₁₀, and PM_{2.5}. Thus, the project's contribution to cumulative air quality impacts would be cumulatively considerable and therefore significant.

Operation

For operational air quality emissions, any project that does not exceed or can be mitigated to less than the daily regional threshold values is not considered by the SJVAPCD to be a substantial source of air pollution and does not add significantly to a cumulative impact. As discussed, SJVAPCD Rules 9510 and 9410 would contribute to reducing emissions of NOx and particulate matter associated with future individual projects accommodated under the proposed Specific Plan and may reduce impacts for these individual development projects to a less than significant level. In addition, the planned improvements, and goals and policies under the proposed project would generally support a more sustainable development pattern for the Plan Area. Creation of more complete neighborhoods in addition to improving the public transit, pedestrian, and bicycle networks and infrastructure would contribute to the overall reduction in vehicle trips and VMT, which would reduce mobile-source emissions. However, as shown in Table 3.3-7, due to the amount of growth for the proposed Plan Area, operation of the cumulative projects accommodated under the proposed Specific Plan would result in emissions in excess of the SJVAPCD regional emissions thresholds for ROG, NOx, CO, PM₁₀, and PM_{2.5}. Thus, the proposed Specific Plan's air pollutant emissions would be cumulatively considerable and therefore significant.

Conclusion

The mitigation measures provided within the air quality discussion (refer to Section 3.3) have been designed to be consistent with the guidance as promulgated by the SJVAPCD, where applicable. As is currently proposed, the Specific Plan is expected to be built out under a staged approach, and all mitigation would be applicable to each stage. However, even with the application of mitigation measures, operational and constructions emissions levels for the aforementioned criteria pollutants would remain above the defined thresholds of significance. Exceedance of the threshold within an area designated as nonattainment would be a cumulatively considerable impact. As such, implementation of the Specific Plan would have a *cumulatively considerable contribution* and a *significant and unavoidable cumulative impact* on the region's air quality.

BIOLOGICAL RESOURCES

The cumulative context for a cumulative analysis can be defined by region, by political subdivision, or by the geography.

Impact 4.4: Specific Plan implementation would not contribute to the cumulative loss of biological resources including habitats and special status species. (Less than Significant and Less than Cumulatively Considerable)

This cumulative analysis utilizes the "Bioregion" as its cumulative setting. The Plan Area is located in the San Joaquin Valley Bioregion, which has a wide variety of habitats and vegetation, including vernal pools, valley sink scrub and saltbush, freshwater marsh, grasslands, arid plains, orchards, and oak savannah, among many other habitats. The San Joaquin Valley Bioregion is the appropriate cumulative context because environmental impacts related to biological resources are best addressed in the context of geographic areas defined by natural features rather than by political or administrative boundaries.¹

Agricultural land is scattered throughout the Plan Area, but mainly in the southern, western, and southwestern portions of the Plan Area. Irrigation ditches are also located throughout the Plan Area near these active agricultural lands. Developed uses are mainly in the northern, eastern, southern, and southeastern portions of the Plan Area. Undeveloped vacant land previously used for agricultural uses is also scattered throughout the Plan Area.

There remains a potential that special status species could occupy the Plan Area from time to time. Mitigation measures were developed to avoid, minimize, and compensate for direct and indirect effects to biological resources, including special status species and their habitats. It has been found in this EIR that, with the implementation of mitigation measures, the project would not, directly or indirectly, have a substantial adverse effect through habitat modifications or reductions, cause populations to drop below self-sustaining levels, substantially eliminate a community, or substantially reduce the number of, or restrict the range of, an endangered, rare or threatened

¹ U.S.G.S. Bioregions of the Pacific U.S. Available at: https://www.usgs.gov/centers/werc/science/bioregions-pacific-us?qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-science_center_objects=0#qt-s

species, including those considered candidate, sensitive, or special status in local or regional plans, policies, regulations, or by the CDFW or USFWS.

The Plan Area does not contain any natural hydrologic features. The Plan Area contains an internal network of agricultural ditches along the margins of the farm fields. The ditches in proximity to active agricultural areas of the Plan Area are likely regularly maintained to control/collect irrigation runoff from the fields. These features are manmade and are fed only by local irrigation water during the irrigation season or rainfall during the winter/spring season. Because the proposed Specific Plan is a planning document and thus, no physical changes will occur to the environment, adoption of the Specific Plan would not directly impact the environment. There is a reasonable chance that water features could be impacted throughout the buildout of the individual projects. The implementation of an individual project would require a detailed and site-specific review of the site to determine the presence or absence of water features. If water features are present and disturbance is required, Federal and State laws require measures to reduce, avoid, or compensate for impacts to these resources. The requirements of these Federal and State laws are implemented through the permit process. It has been found in this EIR that the project would not have substantial adverse effects, directly or indirectly, on protected wetlands and jurisdictional waters.

Wildlife movement includes migration (i.e., usually movement one way per season), interpopulation movement (i.e., long-term dispersal and genetic flow), and small travel pathways (i.e., daily movement within an animal's territory). While small travel pathways usually facilitate movement for daily home range activities, such as foraging or escape from predators, they also provide connection between outlying populations and the main populations, permitting an increase in gene flow among populations. These habitat linkages can extend for miles and occur on a large scale throughout the greater region. Habitat linkages facilitate movement between populations located in discrete locales and populations located within larger habitat areas.

Impacts from development, such as habitat fragmentation and/or isolation, and the creation of impassable barriers can cause a significant impact to wildlife corridors. Depending on the organism and its needs, movement corridors can either be continuous or discontinuous patches of suitable habitat. Preserving expanses of open space that are connected may enable species utilizing these areas as foraging or breeding habitat to persist.

Subsequent development projects will be required to comply with the City's General Plan, proposed Specific Plan, and adopted Federal, State, and local regulations for the protection of movement corridors. The Specific Plan includes Policy IPR 3.6, which states, "Where sensitive biological habitats have been identified or are discovered on or immediately adjacent to a project site, the project shall include appropriate mitigation measures determined by a qualified biologist."

Implementation of the proposed project would have a *less than significant cumulative impact* and *less than cumulatively considerable* incremental contribution to cumulative impacts on biological resources.

CULTURAL AND TRIBAL RESOURCES

The cumulative context for a cumulative analysis can be defined by region, by political subdivision or by the geography, where sufficient inventory data is available to define it. The cumulative setting for cultural resources includes all of the Fresno County, which includes the entire City of Fresno General Plan Planning Area.

Impact 4.5: Specific Plan implementation would not contribute to the cumulative loss of cultural and tribal resources. (Less than Significant and Less than Cumulatively Considerable)

Cumulative development anticipated in Fresno and the greater Fresno County area, including growth projected by adopted general plans, may result in the discovery and removal of cultural resources, including archaeological, paleontological, historical, and Native American resources and human remains. As discussed in Section 3.5, Cultural and Tribal Resources, a total of 82 cultural resources have been previously recorded within the Plan Area. Of these cultural resources, four are historic archaeological sites and 78 are historic built environment resources. In addition, due to the size of the proposed Specific Plan Area, buildout of the proposed plan could contribute to cumulative impacts related to the regional loss of cultural resources if previously unidentified cultural resources are discovered during construction and proper techniques are not employed.

Future projects in Fresno would be required to comply with General Plan Objectives HCR-1, HCR-2, and HCR-3, as well as Policies HCR-1c, HCR-2a, HCR-2b, HCR-2f, and HCR-3c, which require the City to identify, designate and preserve sites and structures of historical, archaeological, and cultural significance. General Plan Policies HCR-2c and 2g would require future development to evaluate the project site and its Area of Potential Effects (APE), for the potential historic and/or cultural resources by a professional who meets the Secretary of the Interior's Qualifications. Furthermore, mitigation measures incorporated into this EIR would require project applicants for future projects with intact buildings more than 45 years to provide a historic resource technical study and evaluate cultural resources (i.e., prehistoric sites, historic sites, and isolated artifacts and features) discovered during construction activities. Any significant discoveries during construction would be required to be preserved in place or mitigated through relocation or documentation; thus, the project is not anticipated to considerably contribute to a significant reduction in cultural resources.

The proposed project, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Fresno County), would not be expected to cause any significant cumulative impacts to cultural resources. The proposed project would not have cumulatively considerable impacts associated with cultural resources. Implementation of the proposed project would have a *less than significant cumulative impact* and *less than cumulatively considerable* incremental contribution to cumulative impacts on cultural resources.

GEOLOGY, SOILS AND SEISMICITY

The cumulative setting area for geology, soils and seismicity includes the City of Fresno General Plan Planning Area.

Impact 4.6: Specific Plan implementation may contribute to cumulative impacts on geologic and soils characteristics. (Less than Significant and Less than Cumulatively Considerable)

Construction of the individual development projects allowed under the land use designations of the proposed Specific Plan may result in risks associated with geology and soils. For example, there is an ongoing possibility that a fault located anywhere in the state (or region) could rupture and cause seismic ground shaking. Additionally, grading, excavation, removal of vegetation cover, and loading activities associated with construction activities could temporarily increase runoff, erosion, and sedimentation. Other geologic risks such as liquefaction, landsliding, lateral spreading, and soil expansion are also geologic risks that are present.

As discussed in Section 3.6, Geology and Soils, implementation of the proposed Specific Plan would not result in any significant impacts related to this environmental topic. While some cumulative impacts will occur in the region as individual projects are constructed, the proposed General Plan policies and actions, as well as State and Federal regulations, will reduce the risk to people in the region. Furthermore, mitigation measures incorporated into this EIR would require project applicants for future projects to obtain a site-specific Geotechnical Evaluation to implement site-specific recommendations and submit an approved Storm Water Pollution Prevention Plan designed to control erosion and the loss of topsoil to the extent practicable using BMPs that the RWQCB has deemed effective in controlling erosion, sedimentation, runoff during construction activities. Consequently, the proposed Specific Plan would generally not be affected by, nor would it affect, other development approved by the City of Fresno. As a result, the proposed General Plan's incremental contribution to cumulative geologic and soil impacts would be *less than cumulatively considerable*.

GREENHOUSE GASES, CLIMATE CHANGE AND ENERGY

As the California Supreme Court has emphasized, all CEQA analyses of the environmental effects of greenhouse gas (GHG) emissions are inherently cumulative in character. "[B]ecause of the global scale of climate change, any one project's contribution is unlikely to be significant by itself. [...] 'With respect to climate change, an individual project's emissions will most likely not have any appreciable impact on the global problem by themselves, but they will contribute to the significant cumulative impact caused by greenhouse gas emissions from other sources around the globe. The question therefore becomes whether the project's incremental addition of greenhouse gases is 'cumulatively considerable' in light of the global problem, and thus significant.'" (Center for Biological Diversity v. California Department of Fish and Wildlife (2015) 62 Cal.4th 204, 219, quoting (Crockett, Addressing the Significance of Greenhouse Gas Emissions Under CEQA: California's Search for Regulatory Certainty in an Uncertain World (July 2011) 4 Golden Gate U. Envtl. L.J. 203, 207–208.) Thus, the analysis below considers the entire planet as a backdrop while focusing on whether the proposed project's incremental contribution to worldwide GHG emissions is cumulatively considerable.

Impact 4.7: Cumulative impact on climate change from increased project-related greenhouse gas emissions. (Less than Significant and Less than Cumulatively Considerable)

In California, there has been extensive legislation passed with the goal of reducing GHG emissions. The legislative goals are as follows: 1) 1990 levels by 2020 and 2) 40% below 1990 levels by 2030. An additional goal -- 80% below the 1990 levels by the year 2050 – was set by Governor Schwarzenegger through Executive Order S-03-05. An even more ambitious goal of achieving carbon neutrality "as soon as possible, and no later than 2045," was set by Governor Brown through Executive Order B-55-18. To achieve these legislative and executive goals, the California Air Resources Board (CARB) has developed regional GHG emission reduction targets for the automobile and light truck sectors (the largest single source of GHG emissions) for 2020 and 2040. The regional GHG emission reduction targets for each region in California were established by the CARB.

As described in Impact 3.4-2 in Section 3.4, implementation of the Specific Plan is consistent with the current version of the City GHG Reduction Plan, which is considered a "Qualified Plan," according to CEQA Guidelines §15183.5, thereby allowing for streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. Therefore, the proposed project would not generate GHG emissions, directly and indirectly, that would have a significant impact on the environment. Moreover, the Specific Plan incorporates goals and policies that emphasize compact and walkable communities, which were incorporated into the design of the proposed project and would help minimize GHG emissions generated by the proposed project. Further, the proposed project would be required to implement mitigation measures that are intended to reduce GHG emissions to the maximum extent feasible. The State of California continues to implement measures that are intended to reduce emissions on a State-wide scale (i.e. vehicle fuel efficiency standards in fleets, low carbon fuels, etc.) that are consistent with AB 32 and SB 32. These types of statewide measures will benefit the proposed project (and city as a whole) in the long-term as they come into effect; however, the City does not have the jurisdiction to create far-reaching (i.e. statewide) measures to reduce GHG emissions. On a project-by-project case, the City of Fresno evaluates a project and the potential to impose projectspecific mitigation, which has been done through this GHG analysis. For these reasons, implementation of the Specific Plan would have a less than cumulatively considerable impact to GHGs.

HAZARDS AND HAZARDOUS MATERIALS

The cumulative context for the analysis of cumulative hazards and human health impacts is all of Fresno County, which includes the entire Fresno General Plan Planning Area.

Impact 4.8: Specific Plan implementation may contribute to cumulative impacts related to hazards and hazardous materials. (Less than Significant and Less than Cumulatively Considerable)

The Specific Plan, in conjunction with cumulative development in the region, would include areas designated for a variety of urban, agricultural, and open space uses as defined by the applicable

General Plan. Cumulative development would include continued operation of, or development of, new facilities as allowed under each land use designation.

<u>Hazardous Materials Use, Generation, Transport, and Disposal</u>

New development could increase the use of hazardous materials within the region, resulting in potential health and safety effects related to hazardous materials use. Potential impacts related to hazards and/or hazardous materials associated with new and future development would primarily be confined to commercial and industrial areas and would not involve the use of hazardous substances in large quantities or be particularly hazardous. Facilities that store, use or handle hazardous materials above reportable amounts are required to prepare and file a Hazardous Materials Business Plan (Business Plan) for the safe storage and use of chemicals. In the event of an emergency, firefighters, health officials, planners, public safety officers, health care providers and others rely on the Business Plan. Implementation of the Business Plan should prevent or reduce damage to the health and safety of people and the environment if a hazardous material is released.

Accidental Release of Hazardous Materials

Incidents (such as accidental release of hazardous materials), if any, would typically be site specific and would involve accidental spills or inadvertent releases. Associated health and safety risks would generally be limited to those individuals using the materials or to persons in the immediate vicinity of the materials and would not combine with similar effects elsewhere (i.e., construction workers). Hazard-related impacts tend to be site-specific and Project-specific. The Plan Area is not associated with any existing hazardous materials spills; however, there are numerous areas throughout Fresno County where hazardous conditions are present. In addition, Mitigation Measures 3.8-1 through 3.8-10 address potential risk of hazards due to existing hazards located on the project site.

School Sites

As provided under Impact 3.8-1, with implementation of Mitigation Measure 3.8-1 through 3.8-10, potential risks associated with the routine transport, use, or disposal of hazardous materials resulting from implementation of the Specific Plan would be reduced to a less than significant level. For example, Mitigation Measure 3.8-1 requires businesses generating hazardous waste to comply with a HMBP and to register with the CUPA, as appropriate. Mitigation Measure 3.8-2 provides requirements for any ground disturbance activities within 50 feet of a well. Additional requirements are provided in Mitigation Measures 3.8-3 through 3.8-10, such as Phase I and Phase II site assessments, and other remediation activities including surveys and assessments, cleanup plans, programs, and activities, as applicable. Moreover, compliance with the applicable General Plan objectives and policies would ensure that the Specific Plan implementation would have a limited potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste with one-quarter of an existing school.

Emergency Response

As provided under Impact 3.8-5, future construction activities within the Plan Area could affect access along nearby roadways during construction. However, access would remain open and accessible at all times. Future applicants would be required to provide alternate route (i.e. detour) plans with a tentative schedule of planned closures prior to the beginning of construction to ensure that activities would not impede emergency access. These plans would be subject to review and approval by the City of Fresno Public Works Department, the Fresno Fire Department, and the Fresno Police Department. Construction activities are not expected to result in any unknown significant road closures, traffic detours, or congestion that could hinder emergency vehicle access or evacuation in the event of an emergency. Separately, the proposed project would develop new roadways within the Plan Area. However, the new roadways would be required to comply with the City's police and fire standards for emergency access. Therefore, roadways within the Plan Area would not impair the implementation of or physically interfere with any adopted emergency response plan or emergency evacuation plan. Moreover, where applicable, the proposed project would also be required to comply with the Fresno County's Multi-Hazard Mitigation Plan.

Wildfire/Wildland Fires

As provided under Impact 3.8-6, the proposed project is not located in or near any SRAs or lands classified as VHFHSZs. Areas within the northern, central, and southern portions of the Plan Area are identified as having a moderate potential for wildland fires. According to the Fresno General Plan, the City is largely urbanized or working agricultural land without steep topographies; thus, wildland fire threats are minimal. Although Fresno is proximate to high and very high fire hazard designated areas, the City is largely categorized as little or no threat or moderate fire hazard, which is largely attributed to paved areas. Implementation of the Specific Plan would result in increased urbanization of the area; including increased paved area. Future development would be required to comply with the current fire code (i.e. included in the Fresno Fire Code Section as established by the City of Fresno Fire Department), as well as all applicable City Municipal Code requirements.

Conclusion

Implementation of the Specific Plan would not result in significant increased risks of hazards in the cumulative setting, nor would it result in any significant off-site or indirect impacts. Mitigation measures have been included to reduce the risk of on-site hazards associated with future development activities. With implementation of these mitigation measures, implementation of the Specific Plan would have a *less than significant* cumulative impact relative to this environmental topic. As such, impacts related to hazards and hazardous materials would result in a *less than cumulatively considerable contribution*.

HYDROLOGY AND WATER QUALITY

The cumulative context for the analysis of cumulative stormwater runoff impacts is best addressed on a regional/watershed basis (geography), as such an area captures flows occurring both upstream and downstream of the project site. Because water resources are highly interconnected, the

cumulative setting is based on Fresno County, which is located in the Tulare Lake Hydrological Region.

Impact 4.9: Cumulative impacts related to hydrology and water quality. (Less than Cumulatively Considerable)

Construction of the individual development projects allowed under the land use designations of the proposed Specific Plan has the potential to result in construction-related water quality impacts, impacts to groundwater recharge, and cause flooding, erosion, or siltation from the alteration of drainage patterns.

Stormwater Runoff

Implementation of the Specific Plan would increase the amount of impervious surfaces in the Plan Area, which, without intervention, could increase peak stormwater runoff rates and volumes on and downstream of the Plan Area. The entire Plan Area is within the Fresno Metropolitan Flood Control District's urban flood control system consisting of 158 drainage areas, each 1 to 2 square miles in area. Operation of projects developed under the proposed Specific Plan could generate the same categories of pollutants as construction activities. Additionally, due to future development and infrastructure projects, the overall volume of runoff in Fresno could be increased compared to existing conditions. If the drainage system is not adequately designed, Specific Plan buildout could result in localized higher peak flow rates. Localized increases in flow would be significant if increases exceeded system capacity or contributed to bank erosion.

In order to ensure that future development projects in the County do not increase downstream flood elevations due to increased peak stormwater runoff, the Fresno Metropolitan Flood Control District (FMFCD) has primary responsibility for managing the local stormwater flows for the City, as well as a large area beyond the City's boundaries. The FMFCD requires future development projects to be designed in conformance to the FMFCD's Urban Storm Drainage Master Plan to ensure storm drainage facilities are adequately designed and that the storm drain system has adequate storage capacity for additional stormwater runoff generated by the Specific Plan. Improvements to storm drainage facilities are accomplished either as a part of privately funded on-site developments or as a part of the master plan, funded by drainage fees. The FMFCD maintains an on-going update to the system hydraulic model for flood control and prepares a capital improvement plan update every five years. Surface runoff from the area will be managed via detention/retention basins and flow reducing Best Management Practices (BMPs) to prevent local flooding within the various development sites within the overall Plan Area. These features will also reduce peak flows from the Plan Area to receiving storm drains and FMFCD facilities. Additionally, future development of the proposed Specific Plan would minimize or eliminate increases in runoff from these new impervious surfaces by runoff entering ditches and storm drains designed in conformance to FMFCD standards.

Design and construction of flood control improvements to the satisfaction of the FMFCD would ensure there is adequate storage capacity for the additional stormwater runoff generated from the buildout of the Specific Plan. Future development within the Plan Area, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans

within Fresno County), would not be expected to cause any significant cumulative impacts associated with stormwater runoff.

Water Quality

As discussed in Impacts 3.1 and 3.9-2, grading, excavation, removal of vegetation cover, and loading activities associated with construction activities could temporarily increase runoff, erosion, and sedimentation. Construction activities could also result in soil compaction and wind erosion effects that could adversely affect soils and reduce the revegetation potential at construction sites and staging areas. The long-term operations of future development projects in the Plan Area could result in long-term impacts to surface water quality from urban stormwater runoff. The proposed Specific Plan would result in new impervious areas associated with roadways, driveways, parking lots, buildings, and landscape areas. Normal activities in these developed areas include the use of various automotive petroleum products (i.e. oil, grease, and fuel), common household hazardous materials, heavy metals, pesticides, herbicides, fertilizers, and sediment. Within urban areas, these pollutants are generally called nonpoint source pollutants. The pollutant levels vary based on factors such as time between storm events, volume of storm event, type of uses, and density of people.

Future development of the Specific Plan Area would require development and approval of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP will include BMPs to regulate stormwater quality for the Specific Plan Area. In accordance with the National Pollution Discharge Elimination System (NPDES) Stormwater Program, compliance with existing regulatory requirements require preparation of a SWPPP designed to control erosion and the loss of topsoil to the extent practicable using BMPs that the Regional Water Quality Control Board (RWQCB), Central Valley Region, has deemed effective in controlling erosion, sedimentation, and runoff during construction activities. The RWQCB has stated that these erosion control measures are only examples of what should be considered and should not preclude the use of equally or more effective new or innovative approaches currently available or being developed. The specific controls are subject to the review and approval by the RWQCB and the City of Fresno and are an existing regulatory requirement.

While there are no assurances that other projects in the County would incorporate the same degree or methods of treatment as the proposed Specific Plan, each project in the City that would discharge stormwater runoff would be required to comply with NPDES discharge permits from the RWQCB, which adjusts requirements on a case-by-case basis to avoid significant degradation of water quality. Therefore, while a greater quantity of urban runoff may result from future development projects in the Plan Area because of an increase in impervious surfaces, the associated surface water quality impacts associated with the increased runoff in the Plan Area would be expected to be less-than-significant because adherence to existing NPDES discharge permit requirements and other regulatory mechanisms which regulate stormwater runoff.

Compliance with City and FMFCD water quality protection regulations, approval from the RWQCB, and implementation of project-specific SWPPPs would ensure that the Specific Plan minimizes impacts to surface water quality. The proposed Specific Plan, when considered alongside all past,

present, and probable future projects (inclusive of buildout of the various General Plans within Fresno County), would not be expected to cause any significant cumulative impacts given that mitigation measures would control storm water quality. The proposed Specific Plan would not have cumulatively considerable impacts associated with water quality.

Groundwater Supplies/Recharge

The West Area Neighborhoods Specific Plan would result in new impervious surfaces and could reduce rainwater infiltration and groundwater recharge in those areas. Infiltration rates vary depending on the overlying soil types. In general, sandy soils have higher infiltration rates and can contribute to significant amounts of ground water recharge; clay soils tend to have lower percolation potential; and impervious surfaces such as pavement significantly reduce infiltration capacity and increase surface water runoff. Future development, including water quality BMPs, detention basins, and retention basins, would be designed to minimize or eliminate increases in runoff from these new impervious surfaces entering storm drains and other FMFCD facilities.

Future development of the Plan Area under the proposed land use plan will modify the movement of water across the land surface and the infiltration of rain water into the groundwater system. The FMFCDs Storm Water Quality Management Plan, City General Plan policies, City Municipal Code requirements, and proposed Specific Plan policies include BMPs aimed at preserving water quality and groundwater recharge areas. The BMPs required as part of future development of the Plan Area are designed to infiltrate as much storm water runoff as practicable into the ground. A portion of the retained runoff will infiltrate into the ground, helping to replenish the aquifers. The required BMPs are designed to trap contaminants and to beneficially make use of nutrients in the vegetated swales and planted areas. In addition, application rates of fertilizers on urbanized areas is less than that typically used in intensive agriculture. The aggregate effect of the proposed Specific Plan will, therefore, be to decrease the loading of nutrients (in particular, nitrates) into the groundwater.

The proposed Specific Plan, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Fresno County), would not be expected to cause any significant cumulative impacts given that mitigation measures require maintaining water quality standards and preserving the infiltration of rainwater within the aquifer. The proposed Specific Plan would not have cumulatively considerable impacts associated with groundwater supply/recharge.

Flooding

Future development projects in the area could result in additional discharges of stormwater during storm events. When combined, these future development projects could, in theory, lead to an incremental increase in peak stormwater runoff, and potential incremental increases in downstream flood elevations. However, in order to ensure that future development projects in the County do not increase downstream flood elevations, the FMFCD has primary responsibility for managing the local stormwater flows for the City, as well as a large area beyond the City's boundaries. Improvements to storm drainage facilities are accomplished either as a part of privately funded on-

site developments or as a part of the master plan, funded by drainage fees. FMFCD maintains an ongoing update to the system hydraulic model for flood control and prepares a capital improvement plan update every five years.

The Plan Area includes an extensive system of on-site stormwater collection, treatment and retention facilities to accommodate the increased stormwater flows that originate in the Plan Area. Surface runoff from the area will be managed via detention/retention basins and flow reducing Best Management Practices (BMPs) to prevent local flooding within the Plan Area. These features will also reduce peak flows from the Plan Area to receiving storm drains.

As discussed in Impact 3.9-6, the Plan Area is approximately 105 miles from the coast and is not adjacent to any lakes; thus, the Plan Area is not at risk for tsunami or seiche events. Additionally, as shown on Figure 3.9-3, the entire Plan Area is designated unshaded Zone X - minimal flood hazard, and would not be expected to have a flood hazard up to the level of the 0.2-percent annual chance flood. Lands designated as unshaded Zone X are outside of the Special Flood Hazard Areas. Changes to land surfaces in these areas do not trigger map revisions and no flood insurance requirements are imposed on structures in these areas.

No other parts of the Specific Plan Area are designated as flood prone, and there are no impacts to regulatory floodways or Special Flood Hazard Areas (Zone A or AE) as defined by FEMA. Provided future storm drain system and detention/retention facilities that would be installed as part of future development are adequately sized and properly installed and maintained, flooding will not be induced by the proposed Specific Plan. Therefore, the Specific Plan is not at risk of the 1-percent annual chance flood.

The proposed Specific Plan, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Fresno County), would not be expected to cause any significant cumulative impacts given that existing City and FMFCD regulations require designs that ensure structures are outside the base flood elevation and that storm water flows are maintained to prevent downstream flooding. The proposed Specific Plan would not have cumulatively considerable impacts associated with flooding.

Conclusion

Construction of the individual development projects allowed under the land use designations of the proposed General Plan has the potential to result in construction-related water quality impacts, impacts to groundwater recharge, and cause flooding, erosion, or siltation from the alteration of drainage patterns.

While some cumulative impacts will occur in the region as individual projects are constructed, the existing General Plan policies and actions, as well as State and Federal regulations, will substantially reduce the impacts. Additionally, future projects under the Specific Plan would be required to design storm drain facilities to the satisfaction of the FMFCD to ensure each project provides adequate storage capacity for the additional stormwater runoff generated. Considering the protection granted by local, State, and Federal agencies and their permit and monitoring requirements, as discussed in

Section 3.9 (Hydrology and Water Quality), and with implementation of the policies and actions included within the General Plan, the overall cumulative impact would not be significant. As a result, the General Plan's incremental contribution to cumulative hydrology impacts would be *less than cumulatively considerable*.

LAND USE

The cumulative setting for land use is the Fresno General Plan Planning Area, as defined in the City of Fresno General Plan.

Impact 4.10: Specific Plan implementation may contribute to cumulative impacts on communities and local land uses. (Less than Significant and Less than Cumulatively Considerable)

Cumulative land use impacts, such as the potential for conflicts with adjacent land uses and consistency with adopted plans and regulations, are typically site and project-specific. The land uses allowed under the proposed Specific Plan provide opportunities for cohesive new growth at in-fill locations within existing urbanized areas as well as new growth within the Plan Area, but would not create physical division within existing communities. New development and redevelopment projects would be designed to complement the character of existing neighborhoods and provide connectivity between existing development and new development within the cumulative analysis area. The proposed Specific Plan does not include any new roadways, infrastructure, or other features that would divide existing communities. Instead, the Specific Plan would plan for extension of existing roadways and infrastructure, as well as new future roadways and infrastructure, in order to serve future development of the Plan Area. These new roadways would link existing unincorporated areas of the County with the City of Fresno.

Overall, the proposed Specific Plan is consistent with the objectives and policies of the Fresno General Plan. Other projects in the cumulative context would undergo a General Plan consistency review, similar to the proposed Specific Plan, on a project-by-project basis to demonstrate their consistency with the applicable land use document. Therefore, the proposed Specific Plan's incremental contribution to cumulative land use and population impacts would be *less than cumulatively considerable*.

Noise

The cumulative context for noise impacts associated with proposed Specific Plan consists of the existing and future noise sources that could affect the project or surrounding uses.

Impact 4.11: Specific Plan implementation may contribute to the cumulative exposure of existing and future noise-sensitive land uses or to increased noise resulting from cumulative development. (Less than Significant and Less than Cumulatively Considerable)

Noise generated by construction would be temporary, and would not add to the permanent noise environment or be considered as part of the cumulative context. The total construction noise

impact of the proposed Specific Plan would not be a substantial increase to the existing future noise environment.

As discussed in Impact 3.11-1 in Section 3.11, Noise, some of the existing noise sensitive receptors located along the Specific Plan Area roadways are currently exposed to exterior traffic noise levels exceeding the City of Fresno 65 decibel (dB) day/night average level (L_{DN}) exterior noise level standard for residential uses, as shown in Table 3.11-10. Based upon General Plan Policy NS-1j, a significant increase in ambient noise levels is assumed if the project would increase noise levels in the immediate vicinity by 3 dB L_{dn} or CNEL above the ambient noise limits established in the General Plan Update (or in this case the modeled increase in traffic noise levels due to the project). The contribution to traffic noise increases resulting from future development of the proposed Specific Plan is predicted to be between 0 dBA and 13.4 dBA L_{DN} . The following roadway segments would exceed the substantial increase criteria described in Policy NS-1j and Table 3.11-10:

- Traffic noise levels along **W. Shaw Avenue** are expected to range between 68.1 and 73.3 dBA CNEL at a distance of 100 feet from the centerline of the road, resulting in increases ranging between 6.9 and 8.3 dBA CNEL.
- Traffic noise levels along W. Ashlan Avenue between N. Grantland Avenue and N. Blythe
 Avenue are expected to range between 67.5 and 70.4 dBA CNEL at a distance of 100 feet
 from the centerline of the road, resulting in increases ranging between 5.6 and 13.4 dBA
 CNEL.
- Traffic noise levels along W. Shields Avenue between N. Polk Avenue and N. Cornelia
 Avenue are expected to reach up to 66 dBA CNEL at a distance of 100 feet from the
 centerline of the road, resulting in an increase in ambient noise level of 7.6 dBA CNEL.
- Traffic noise levels along W. Clinton Avenue between N. Polk Avenue and N. Blythe Avenue
 and between N. Valentine Avenue and N. Marks Avenue are expected to range between
 66.9 and 69.7 dBA CNEL at a distance of 100 feet from the centerline of the road, resulting
 in increases in ambient noise levels ranging between 5.5 and 8.0 dBA CNEL
- Traffic noise levels along N. Grantland Avenue between W. Gettysburg Avenue and W. Dakota Avenue and between W. Shields Avenue and W. Clinton Avenue are expected to range between 67.7 and 71.0 dBA CNEL at a distance of 100 feet from the centerline of the road, resulting in increases in ambient noise levels between 10.5 and 11.5 dBA CNEL.
- Traffic noise levels along N. Bryan Avenue between W. Gettysburg Avenue and W. Ashlan Avenue are expected to reach up to 65.3 dBA CNEL, resulting in an increase of 7.7 dBA CNEL in ambient noise levels.
- Traffic noise levels along N. Hayes Avenue between W. Shaw Avenue and W. Swift Avenue and between W. Dakota Avenue and W. Shields Avenue are expected to range between 65.9 and 66.8 dBA CNEL at a distance of 100 feet from the centerline of the road, resulting in increases in ambient noise levels ranging between 9.3 and 11.8 dBA CNEL.
- Traffic noise levels along **N. Polk Avenue between W. Shaw Avenue and W. Shields Avenue** are expected to range between 65.3 and 68.7 dBA CNEL at a distance of 100 feet from the

- centerline of the road, resulting in increases in ambient noise levels between 5.5 and 8.1 dBA CNEL.
- Traffic noise levels along N. Cornelia Avenue between W. Gettysburg Avenue and W. Ashlan Avenue are expected to reach up to 66.1 dBA CNEL, resulting in an increase of 5.9 dBA CNEL in ambient noise levels.

Of the 115 roadway segments analyzed, 30 segments would experience substantial noise increases greater than 3 dBA attributable to buildout of the proposed Specific Plan, with noise levels that exceed 65 dB CNEL.

For these reasons, future development projects within the Plan Area would be required to implement mitigation measures that are specifically intended to ensure compliance with the City of Fresno noise standards and minimize the impact associated with the substantial increase in ambient noise levels. Mitigation Measure 3.11-1 would require the implementation of performance standards based on project-specific acoustical analysis for new residential and noise sensitive uses exposed to significant exterior community noise levels from transportation, which may include noise walls and/or berms, or setbacks.

With implementation of the mitigation measures included in Section 3.11, the proposed Specific Plan's incremental contribution towards cumulative noise impacts would be *less than cumulatively considerable* and *less than significant*.

POPULATION AND HOUSING

The cumulative setting for population and housing includes Fresno County. This area was chosen because it represents the area that is reasonably expected to be affected by population and housing changes generated by the proposed project.

Impact 4.12: Specific Plan implementation may contribute to cumulative impacts on population growth and displace substantial numbers of people or existing housing. (Less than Significant and Less than Cumulatively Considerable)

As described in Section 3.12, the proposed Specific Plan accommodates future growth in the Plan Area, including new businesses and new residential uses. Infrastructure and services would need to be extended to accommodate future growth. At full buildout, the proposed Specific Plan would accommodate approximately to 54,953 dwelling units (including 47,072 dwelling units in the residential category, 7,814 dwelling units in the mixed use category, and 67 dwelling units in the commercial category) and approximately 60,621,006.31 square feet of non-residential uses. This new growth would increase the city's population by approximately 163,211 residents. According to the General Plan, it is estimated that there would be 0.45 jobs per new resident; therefore, buildout of the proposed Specific Plan may increase the employment opportunities in Fresno by approximately 73,445 jobs.

Based on the growth projected to occur in the Plan Area, the proposed Specific Plan would not induce a substantial amount of growth that has not been adequately planned for or require the construction of replacement housing elsewhere. Although the number of new residents generated

under the proposed Plan could exceed the number analyzed under the City's General Plan Master EIR (MEIR) under the Dual Designation Scenario, cumulative growth would be consistent with regional planning targets.

Future development of the Plan Area consistent with the proposed land use map could result in displacement of existing housing. Housing displacement associated with development of the Plan Area was accounted for in the City's General Plan MEIR. Much of the future development would be located on areas that are vacant, contain agricultural land, or contain rural residential uses. Redevelopment of currently developed parcels could also occur. However, the amount of housing displacement associated with buildout of the Plan Area would be vastly outweighed by the amount of housing created under the proposed Specific Plan land use map. Thus, when considered along with the proposed Plan, cumulative growth would not displace substantial numbers of people or housing or exceed planned levels of growth.

Additionally, all lands within the General Plan jurisdiction have been planned to accommodate growth within the City have been evaluated in the General Plan MEIR. The proposed project does not change the intent, intensities, or densities of land uses identified within the General Plan; instead, the Specific Plan land use map rearranges and relocates the City land use designations for the Plan Area. Therefore, development of the Specific Plan Area will not induce growth in the Specific Plan Area, adjacent undeveloped parcels, or within the City of Fresno that has not already been accounted for in the General Plan, and evaluated for environmental impacts by the City in the Final General Plan EIR.

The proposed project, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Fresno County), would not be expected to cause any significant cumulative impacts. The proposed project would not have cumulatively considerable impacts associated with population and housing. As such, implementation of the proposed project would have a *less than significant* and *less than cumulatively considerable* contribution to impacts to population and housing.

PUBLIC SERVICES AND RECREATION

The cumulative setting would include all areas covered in the service areas of the City of Fresno Police Department, Fresno Fire Department (FFD), City of Fresno Parks, After School, Recreation, and Community Services (PARCS) Department, the Central Unified School District (CUSD), and the Fresno County Public Library System.

Impact 4.13: Specific Plan implementation may contribute to cumulative impacts on public services. (Cumulatively Considerable and Significant and Unavoidable)

This geographic area was chosen because these service providers would be required to serve the Plan Area as well as the entire service area. Therefore, future development within the Plan Area along with past, present, and probably future projects within the service area, has the potential to result in a cumulative impact associated with implementation of the proposed Specific Plan.

Under cumulative conditions future local and regional growth will result in increased demand for schools, police protection, fire protection, schools, parks/recreation, and library services. The City and its associated service providers must continue to evaluate the levels of service desired and the funding sources available to meet increases in demand.

The General Plan Final Master EIR analyzed cumulative impacts to public services (including police protection, fire and emergency services, schools, parks, and libraries) and found that General Plan implementation would result in less than cumulatively considerable impacts with implementation of Mitigation Measures PS-1 (regarding future fire facilities), PS-2 (regarding future police facilities), PS-3 (regarding future school facilities), and PS-4 (regarding future parks and recreational facilities). The mitigation measures require evaluation of specific environmental effects of these future public service and recreational facilities, and list typical mitigations to reduce potential noise, traffic, and lighting impacts. The specific environmental impact of constructing new facilities could not be determined at the time, but the Final Master EIR found that construction and operation of such facilities could potentially cause significant impacts. These potential impacts, however, were addressed and mitigated to the greatest extent feasible by the General Plan mitigation measures included in Section 5.13 of the Fresno General Plan Final Master EIR.

Conclusion

Under cumulative conditions, future development of the Plan Area in accordance with the proposed Specific Plan land use map may result in the construction of public facilities, which may cause substantial adverse physical environmental impacts. The impact fees developed and reviewed by the City will recover future development's proportionate share of City-related capital asset costs. Fees, as applied only to new development, represent future development's proportionate share of public services and facilities capital costs.

It is also important to note that, in addressing public service demand issues under CEQA, the appropriate focus is on the environmental effects of whatever steps might be necessary to achieve or maintain adequate service. For example, if proposed new development would create an increased demand for law enforcement or fire protection services, an EIR should inquire as to whether new or expanded physical facilities may be required in order to provide such service. The "impacts" addressed under CEQA are the physical effects of providing service, not any possible failure to provide adequate service under applicable standards. (See *City of Hayward v. Board of Trustees of the Cal. State University* (2015) 242 Cal.App.4th 833, 843 ["[t]he need for additional fire protection services is not an environmental impact that CEQA requires a project proponent to mitigate"]; *Goleta Union School Dist. v. Regents of Univ. of Cal.* (1995) 37 Cal.App.4th 1025, 1031–1034 [school overcrowding attributable to new development is not an environmental effect subject to CEQA, though the physical effects of new facility construction to serve new students would be]; and CEQA Guidelines, § 15131, subd. (a) ["[e]conomic or social effects of a project shall not be treated as significant effects on the environment"].)

Moreover, it is critical to understand that special legal principles apply to impacts to school facilities. According to Government Code Section 65996, the development fees authorized by Senate Bill 50

(1998) (described earlier) are deemed to be "full and complete school facilities mitigation" for impact caused by new development. The legislation also recognized the need for the fee to be adjusted periodically to keep pace with inflation. The legislation indicated that in January 2000, and every two years thereafter, the State Allocation Board would increase the maximum fees according to the adjustment for inflation in the statewide index for school construction.

Section 65996 also prohibits public agencies from using CEQA or "any other provision of state or local law" to deny approval of "a legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property or any change in governmental organization or reorganization" on the basis of the project's impacts on school facilities.

The construction and operation of future public facilities required to serve cumulative development (including the Plan Area) could potentially cause significant impacts. Cumulative development including additional parks and schools within the city and service area would contribute to significant and unavoidable cumulative impacts that have been identified within this EIR related to: aesthetics and visual resources (Section 3.1), agricultural resources (Section 3.2), air quality (Section 3.3), noise (Section 3.11), and public services and recreation (Section 3.13). Therefore, consistent with the analysis included in this Draft EIR, cumulative impacts related to the construction of public facilities needed to meet future demand are considered *significant and unavoidable and cumulatively considerable*.

TRANSPORTATION AND CIRCULATION

The cumulative setting for this analysis including the City of Fresno SOI and some nearby areas of unincorporated County.

Impact 4.14: Specific Plan implementation may contribute to cumulative impacts to the regional transportation network. (Less than Significant and Less than Cumulatively Considerable)

The year 2035 is the horizon year for cumulative condition impact analyses. Based on observed volumes in the existing condition, Kittelson & Associates used travel behavior forecasting software to estimate and distribute future vehicle traffic onto the roadway network in order to test how the proposed project would impact the transportation network.

Consistency with General Plan

As described in Section 3.14, Transportation and Circulation, development associated with the proposed Plan would increase the amount of multimodal transportation activity which would require the improvement and expansion of the local transportation network in the Plan Area to serve the associated travel demand. The West Area Neighborhoods Specific Plan includes a number of guiding principles related to transit, bicycle, and pedestrian travel consistent with the General Plan policies, which detail how the circulation system will be improved to meet the need of all users. Since the guiding principles of the Specific Plan support the policies of the General Plan, no conflict with policies, plans, and programs for alternative transportation would occur from future

development and redevelopment under the proposed Specific Plan. Therefore, the proposed Specific Plan's cumulative contribution would be considered *less than significant*.

Consistency with CEQA Guideline Section 15064.3

As shown in Table 3.14-2 (as contained within Section 3.14: Transportation and Circulation), the projected VMT per capita and VMT per employee in the Plan Area are lower than existing conditions. Under the Specific Plan, VMT per capita is 7.4 lower, or 46% lower, while VMT per employee is 12.4 lower, or 48% lower. The decrease in VMT is the result of the proposed land use mix within the proposed Plan Area. The City of Fresno Draft VMT Guidelines state specific plans would have an impact if the VMT per capita or VMT per employee in the specific plan area for the horizon year increases compared to the existing VMT per capita or VMT per employee in the region (Fresno County). The VMT per capita in the Specific Plan Area during the horizon year is 8.7, while VMT per employee is 13.2. Under existing conditions in Fresno County, the VMT per capita is 16.1, while the VMT per employee is 25.6. Because the VMT per capita and VMT per employee in the Specific Plan Area during the horizon year is less than the VMT per capita and VMT per employee for existing conditions in Fresno County, the proposed Specific Plan's cumulative contribution to VMT would be considered *less than significant*.

Hazardous Geometric Designs or Incompatible Uses

The proposed Specific Plan would result in a relocation of density in the Plan Area to central corridors compared to what would develop under the City's General Plan where density is more distributed throughout the Plan Area; however, the Specific Plan does not propose to change the types (i.e., residential, commercial, office, etc.) of land uses in the Plan Area. Buildout of the proposed Specific Plan would result in some changes to the City's circulation network, but would not increase hazards or incompatible uses due to design features. All future roadway system improvements associated with development and redevelopment activities under the Specific Plan would be designed in accordance with the established roadway design standards, some of which have also been incorporated into the Circulation Element of the City's General Plan.

With implementation of General Plan Policy MT-2-e, Policy MT-2-I, and application of the conditions of approval at the time of review of land development projects, the Specific Plan would be designed to ensure that no hazardous circulation conditions are created as a result of implementation of the Plan. Therefore, the proposed Specific Plan's cumulative contribution would be considered *less than significant*.

Conclusion

As described in Section 3.14, Transportation and Circulation, development associated with the proposed Plan would increase the amount of multimodal transportation activity which would require the improvement and expansion of the local transportation network in the Plan Area to serve the associated travel demand; however, as discussed in Impact 3.14-2, the VMT per capita and VMT per employee in the Specific Plan Area are lower than existing conditions due to the proposed land use mix within the Specific Plan Area. The retail and employment opportunities keep the VMT

per capita lower than the County average while the large number of dwelling units near the jobs allows employees to live close to work resulting in a VMT per employee that is lower than the County average today. The proposed Specific Plan, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Fresno County), would not be expected to cause any significant cumulative impacts given the proposed Specific Plan would result in a lower contribution to overall transportation network than if the Plan Area was developed with the existing General Plan land use designations. As a result, this is considered *less than cumulatively considerable* impact.

UTILITIES

The cumulative setting for the various utilities (wastewater, water, stormwater and solid waste) are described below.

Impact 4.15: Specific Plan implementation may contribute to cumulative impacts on utilities. (Less than Cumulatively Considerable)

Under the proposed Specific Plan buildout conditions, the City of Fresno would see an increased demand for wastewater service, water service, solid waste disposal services, and stormwater infrastructure needs.

Wastewater

The study area for cumulative impacts regarding wastewater is the City of Fresno General Plan Planning Area and the City of Clovis because the City of Fresno acts as the Regional Sewering Agency and is responsible for operating the Fresno/Clovis Regional Wastewater Reclamation Facility. The City of Fresno owns and operates two wastewater treatment facilities that serve the Fresno metropolitan area: the Fresno/Clovis Regional Wastewater Reclamation Facility (Regional Facility) and the North Fresno Wastewater Reclamation Facility (NFWRF).

The City's wastewater collection system comprises over 1,600 miles of gravity sewer pipes, 24,100 maintenance holes, and 15 sewer pump stations with 11.5 miles of force mains (force mains are pressurized pipelines associated with the pump stations). Generally, the collection system flows from northeast to southwest across the entire City. In the Plan Area, wastewater generally flows from the north to the south. Clovis has four connections to the City's collection system. Each of these connections have flow meters that measure the flow from the Clovis sewer system into the City's sewer system. The Plan Area is currently served by over 86 miles of sewer pipelines, and Pump Station Number 15.

As discussed in Section 15.1, Wastewater Service, buildout of the Specific Plan does not trigger a need to expand the Regional Facility. Given the capacity of 92 MGD, the average annual flow of approximately 56 MGD, and the 11.5 MGD generated by the buildout of the Specific Plan Area (including existing demand and future demand), there is sufficient plant capacity. Additionally, the Specific Plan wastewater collection system will include future construction of sewer improvements and replacements of existing lines, some of which are now over 75 years old. Therefore, the proposed Specific Plan's cumulative contribution to wastewater service is *less than significant*.

Water

The study area for cumulative impacts regarding water supply is the City of Fresno General Plan Planning Area and the groundwater basins from which the Plan Area derives water. The existing incorporated area of the City of Fresno encompasses approximately 115 square miles (2020 UWMP). The City's General Plan includes the City's the area outside of the City limits that the City expects to annex and urbanize in the future, also known as the SOI. With a few exceptions, the City's water service area is coterminous with the City limits. As future developments within the SOI, but outside the City limits, are approved, they will be annexed into the City and served by the City water system.

The City's water system consists of about 1,860 miles of distribution and transmission mains, 260 municipal groundwater wells, three surface water treatment facilities (SWTFs) with current rated capacities ranging from 4 to 54 MGD, five water storage facilities with pump stations, including one at each of the SWTFs plus two in the distribution system, and three booster pump facilities. As of the close of the 2020 calendar year, the City has over 139,500 residential, commercial, industrial, and institutional water service connections and produced nearly 122,000 AF of water.

The provision of public services and the construction of onsite and offsite infrastructure improvements will be required to accommodate future development consistent with the Specific Plan land use map. The Specific Plan would likely require extension of offsite water infrastructure to the undeveloped and underdeveloped portions of the Plan Area for water service. All offsite water piping improvements would be in or adjacent to existing roadways, thereby limiting new environmental impacts. Additionally, future development in the Plan Area would be required to pay the applicable water system connection fees and pay the applicable water usage rates. As discussed in Impact 3.15-3, the proposed Specific Plan would not require construction of new water treatment facilities or expansion of existing facilities, resulting in a significant environmental impact. The water infrastructure would be sized to meet the demand of future projects within the Plan Area.

Table 3.15-7 summarizes the projected availability of the City's existing and planned future potable water supplies and the City's projected water demands in normal, single dry and multiple dry years through 2045. The WSA completed for the Specific Plan demonstrates that the City's existing and additional potable water supplies are sufficient to meet the City's existing and projected future potable water demands, including those future water demands associated with the Specific Plan, to the year 2045, under all hydrologic conditions. Additionally, the City's preliminary water demand projections for the proposed Plan Area analyzed under the General Plan were higher than the water demand projections for the Specific Plan; thus, the General Plan assumed greater water demand than what would occur with implementation of the Specific Plan. Therefore, the proposed Specific Plan's cumulative contribution to water service is *less than significant*.

<u>Stormwater</u>

The study area for cumulative impacts regarding storm water drainage is the Fresno-Clovis Metropolitan Area because the FMFCD includes an area of approximately 400 square miles and covers almost the entire portion of the Fresno-Clovis Metropolitan Area. The specific impacts of

providing new and expanded stormwater drainage facilities cannot be determined at this time, as the Specific Plan does not propose development nor does it designate specific sites for new or expanded public facilities. Stormwater drainage and conveyance facilities would be evaluated at the project-level in association with subsequent development projects.

Installation of storm drainage infrastructure would occur during the construction phases of individual future projects within the Plan Area. There is significant storm drainage infrastructure remaining to be constructed to serve the Plan Area. About 32 miles of additional drainage pipelines is anticipated to be constructed to meet buildout needs. As future development and infrastructure projects within the Specific Plan Area are considered by the City, each project will be evaluated for conformance with the Specific Plan, General Plan, Municipal Code, and other applicable regulations. The proposed Specific Plan's cumulative contribution to the stormwater and flood control system would be *less than significant* upon compliance with regulatory requirements and proposed policies for full implementation of the proposed Plan.

Solid Waste

Shortage of waste disposal capacity can have significant impacts on adjacent areas. If refuse is exported to adjacent areas with existing spare capacity, significant impacts due to increased travel distances can result in additional transportation related impacts.

As described under Impact 3.15-6, the addition of solid waste associated with future buildout of the Specific Plan Area, would result in greater solid waste needing to be disposed of at the American Avenue Landfill and the Clovis Landfill. However, this increase would not cause an exceedance of the landfill's remaining capacity. In addition, AB 939 mandates the reduction of solid waste disposal in landfills. The City is currently achieving a 71 percent diversion rate based on 2009 data, which is anticipated to increase due to the Fresno City Council adopted resolution committing the City to a Zero Waste goal by 2025. Therefore, the proposed Specific Plan's cumulative contribution to solid waste is *less than significant*.

Conclusion

As described above, the proposed Specific Plan, when considered alongside all past, present, and probable future projects (inclusive of buildout of the various General Plans within Fresno County), would not be expected to cause any significant cumulative impacts. The City has adequate landfill capacity to accept the solid waste and wastewater service capacity to treat wastewater flows generated from buildout of the Specific Plan. Additionally, the Water Supply Assessment completed for the proposed Plan Area shows that adequate water supplies exist to serve Specific Plan buildout. As a result, this is considered *less than cumulatively considerable* impact.

4.2 Growth-Inducing Effects

Introduction

Section 15126.2(d) of the CEQA Guidelines requires that an EIR evaluate the growth-inducing impacts of a proposed action, directing:

Discuss the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also, discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Based on the CEQA Guidelines, growth inducement is any growth that exceeds planned growth of an area and results in new development that would not have taken place without implementation of the project. A project can have direct and/or indirect growth inducement potential. Direct growth inducement would result if a project, for example, involved construction of new housing. A project would have indirect growth inducement potential if it established substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it would involve a construction effort with substantial short-term employment opportunities that would indirectly stimulate the need for additional housing and services to support the new employment demand (Napa Citizens for Honest Government v. Napa County Board of Supervisors). Similarly, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. A project providing an increased water supply in an area where water service historically limited growth could be considered growth-inducing.

The CEQA Guidelines further explain that the environmental effects of induced growth are considered indirect impacts of the proposed action. These indirect impacts or secondary effects of growth may result in significant, adverse environmental impacts. Potential secondary effects of growth include increased demand on other community and public services and infrastructure, increased traffic and noise, and adverse environmental impacts such as degradation of air and water quality, degradation or loss of plant and animal habitat, and conversion of agricultural and open space land to developed uses.

Growth inducement may constitute an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Local land use plans provide for land use development patterns and growth policies that

allow for the orderly expansion of urban development supported by adequate urban public services, such as water supply, roadway infrastructure, sewer service, and solid waste service.

The Specific Plan would result in the construction of additional housing and employment opportunities within the City of Fresno. As discussed in Section 3.12, Population and Housing, at full buildout, the proposed Specific Plan would accommodate approximately 54,953 dwelling units (including 47,072 dwelling units in the residential category, 7,814 dwelling units in the mixed use category, and 67 dwelling units in the commercial category) and approximately 60,621,006.31 square feet of non-residential uses. This new growth would increase the city's population by approximately 163,211 residents. According to the General Plan, it is estimated that there would be 0.45 jobs per new resident; therefore, buildout of the proposed Specific Plan may increase the employment opportunities in Fresno by approximately 73,445 jobs. The Specific Plan would foster economic and population growth through the construction of additional housing and employment opportunities for a variety of income levels.

The Specific Plan currently includes primarily farmland and rural residential uses in the western area of the Plan Area. As discussed in Chapter 2.0, Project Description, residential, mixed use commercial, commercial, employment, neighborhood park, community park, schools, and open space and public facility uses would be developed in the Specific Plan Area. Buildout of the Specific Plan would require the extension of off-site and on-site roadway, potable water, wastewater, and storm drainage infrastructure to the undeveloped and underdeveloped portions of the Plan Area, which would result in the elimination of growth obstacles to serve future developments. However, as noted in Section 3.15, Utilities, wastewater generated by the proposed Specific Plan could be accommodated by the existing wastewater treatment facilities. Additionally, the City has adequate water supply to meet the water demand from buildout of the Specific Plan and the landfill that would serve the Specific Plan has adequate capacity to manage the solid waste generated as a result of the Specific Plan. Furthermore, mitigation measures set forth in Section 3.9, Hydrology and Water Quality, as well as conformance with the Specific Plan, General Plan, Municipal Code, and other applicable regulations, would ensure that buildout of the Specific Plan would not generate or contribute runoff water that would exceed the capacity of the FMFCD's stormwater drainage system.

Increases in population that would occur as a result of a proposed project may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental impacts. As discussed in Section 3.13, Public Services and Recreation, of this EIR, increased demands for fire and police protection services attributable to the proposed project would not necessitate the construction of new facilities that could cause significant environmental impacts. The future buildout of the Specific Plan is expected to generate approximately 20,319 additional students for the CUSD. Even though the project applicant will pay applicable school fees mandated by SB 50, the proposed land use map includes an additional 10.0 acres of Elementary School land uses from what is shown in the existing Fresno General Plan land use map to support the additional students generated by development of the Specific Plan. Therefore, this future school, if constructed, would fall within the range of environmental impacts disclosed in this EIR, and would be subject to relevant mitigation measures included in this EIR. In addition, the proposed land use

map includes two land use designations that could be developed with other public facilities: Public Facilities – Public Facilities, and Public Facilities – Church. Future buildout of the Specific Plan may include construction of a 55.8-acre church site and 27.42 acres of other public facility uses in the Plan Area, which has the potential to cause substantial adverse physical environmental impacts. Therefore, impacts related to constructing a school facility and other public facilities to serve the Plan Area are considered significant.

Given the historical and current population, housing, and employment trends, growth in the City, as well as the entire state, is inevitable. The primary factors that account for population growth are natural increase and net migration. The average annual birth rate for California is expected to be 20 births per 1,000 population. Additionally, California is expected to attract more than one third of the country's immigrants. Other factors that affect growth include the cost of housing, the location of jobs, the economy, the climate, and transportation. While these factors would likely result in growth in Fresno during the planning period of the General Plan, growth will continue to occur based primarily on the demand of the housing market and demand for new commercial, industrial, and other non-residential uses. As future development occurs under the proposed Specific Plan, new roads, utility infrastructure, and public services would be necessary to serve the development and this infrastructure would accommodate planned growth. Based on the growth projected to occur in the City's General Plan Planning Area, the proposed Specific Plan would not induce a substantial amount of growth that has not been adequately planned. Although the number of new residents generated under the proposed Specific Plan would exceed the number analyzed under the General Plan MEIR under the Dual Designation Scenario, cumulative growth would be consistent with regional planning targets. Thus, when considered along with the proposed Plan, cumulative growth would not displace substantial numbers of people or housing or exceed planned levels of growth.

Further, growth within the Specific Plan Area has been anticipated by the City. The land within the West Area Neighborhoods Specific Plan has been planned for urban development within the Fresno General Plan, and the proposed Specific Plan would serve as a bridge between the Fresno General Plan and individual development applications in the Plan Area. The proposed Specific Plan seeks to provide for the orderly and consistent development that promotes and establishes complete neighborhoods within the West Area with enhanced transportation infrastructure, development of core commercial centers, creation of additional parkland, and encouraging the development of a diverse housing stock. The Specific Plan's land use map proposes the relocation of higher density land uses away from the most western and southwestern portions of the Plan Area where they are distant from public transit and community amenities and transfers those higher density land use designations to major corridors. This proposed land use mix within the Specific Plan assists in reducing a number of environmental impacts. For example, the VMT per capita and VMT per employee in the Specific Plan Area during the horizon year is less than the VMT per capita and VMT per employee for existing conditions in Fresno County. In addition, the City's preliminary water demand projections for the proposed Plan Area under the General Plan were higher than for the Specific Plan, resulting in less water demand associated with the Specific Plan land use map when compared to build out of the General Plan. Further, the Plan Area includes future development of a portion of the City's SOI; however, the Plan does not include extension of roadways or utility infrastructure beyond the Plan Area boundary and would not induce growth beyond the limits of the SOI.

In short, while the proposed Specific Plan's increase in population growth would be slightly larger than what was assumed under the General Plan MEIR, the overall growth would not exceed regional growth projections. Thus, while the project would foster population and economic growth, such growth would be similar to what has been previously anticipated for the project region, and a less than-significant impact related to growth inducement would occur.

4.3 SIGNIFICANT IRREVERSIBLE EFFECTS

LEGAL CONSIDERATIONS

CEQA Section 15126.2(c) and Public Resources Code Sections 21100(b)(2) and 21100.1(a), requires that the EIR include a discussion of significant irreversible environmental changes which would be involved in the proposed action should it be implemented. Irreversible environmental effects are described as:

- The project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of a project would generally commit future generations to similar uses (e.g., a highway provides access to previously remote area);
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The phasing of the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Determining whether the proposed project would result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed such that there would be little possibility of restoring them. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Analysis

Implementation of the Specific Plan would result in the conversion of approximately 7,077 acres of land currently used primarily for rural residential and open/space agricultural uses into residential, mixed use commercial, commercial, employment, neighborhood park, community park, schools, and open space and public facility uses. Development of the Specific Plan would constitute a long-term commitment to these uses. It is unlikely that circumstances would arise that would justify the return of the land to its original condition as agricultural land.

A variety of resources, including land, energy, water, construction materials, and human resources would be irretrievably committed for the initial construction, infrastructure installation and connection to existing utilities, and its continued maintenance. Construction of the Specific Plan would require the commitment of a variety of other non-renewable or slowly renewable natural

resources such as lumber and other forest products, sand and gravel, asphalt, petrochemicals, and metals.

Additionally, a variety of resources would be committed to the ongoing operation and life of the Specific Plan. The introduction of new residential, commercial, employment/light industrial, and other uses to the site will result in an increase in area traffic over existing conditions. Fossil fuels are the principal source of energy and the Specific Plan would increase consumption of available supplies, including natural gas, gasoline and diesel. These energy resource demands relate to initial project construction, project operation and site maintenance and the transport of people and goods to and from the Plan Area.

Additionally, the proposed project is in part a response to a market need for housing. California is in the midst of a housing crisis, and the proposed project is consistent with California's legislative findings about the current housing crisis. (See Gov. Code, § 65589.5[a][1][A] ["California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the State's environmental and climate objectives."].) Future development of the proposed land use map could result in up to 54,953 DU at various densities and locations throughout the Plan Area. Buildout of the Plan Area would significantly increase and diversify the City's available housing supply. Therefore, development of the Specific Plan would result in furtherance of the City's Housing Element, and would assist the City in meeting the current and future housing need.

4.4 SIGNIFICANT AND UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(b) requires an EIR to discuss unavoidable significant environmental effects, including those that can be mitigated but not reduced to a level of insignificance. The following significant and unavoidable impacts of the proposed project are discussed in Chapters 3.1 through 3.15 and previously in this chapter (cumulative-level). The following environmental topics were found to have one or more impacts that were found to be significant and unavoidable: Aesthetics, Agricultural Resources, Air Quality, Public Services and Recreation, and Utilities. Those topics are summarized below:

- **Impact 3.1-3:** Specific Plan implementation would result in substantial adverse effects or degradation of visual character or quality of the site and its surroundings.
- **Impact 3.2-1:** Specific Plan implementation would convert Important Farmlands to non-agricultural land uses.
- **Impact 3.2-2:** Specific Plan implementation would conflict with existing zoning for agricultural use, or a Williamson Act Contract.
- **Impact 3.3-1:** Specific Plan implementation would conflict with or obstruct implementation of the applicable air quality plan.
- Impact 3.3-2: Specific Plan implementation during project construction would expose sensitive receptors to substantial pollutant concentrations or result in a cumulatively

- considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard.
- Impact 3.3-3: Specific Plan implementation during project operation would expose sensitive receptors to substantial pollutant concentrations or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard.
- Impact 3.13-3: The proposed Specific Plan may result in, or have the potential to require the construction of school facilities which may cause substantial adverse physical environmental impacts.
- Impact 3.13-4: The proposed Specific Plan may result in, or have the potential to require the construction of park facilities which may cause substantial adverse physical environmental impacts.
- Impact 3.13-5: The proposed Specific Plan may result in, or have the potential to require the construction of other public facilities which may cause substantial adverse physical environmental impacts.
- Impact 3.15-1: The proposed Specific Plan would require or result in the relocation or construction of new or expanded wastewater facilities, the construction of which could cause significant environmental effects.
- Impact 3.15-3: The proposed Specific Plan would require or result in construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.
- Impact 3.15-5: The proposed Specific Plan would require or result in the construction of new or expanded stormwater drainage facilities, the construction of which could cause significant environmental effects.
- **Impact 4.1:** Specific Plan implementation may contribute to the cumulative degradation of the existing visual character of the region.
- **Impact 4.2:** Specific Plan implementation may contribute to the cumulative impact on agricultural land and uses.
- **Impact 4.3:** Specific Plan implementation would contribute to cumulative impacts on the region's air quality
- **Impact 4.13:** Specific Plan implementation may contribute to cumulative impacts on public services.